

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:

Joseph W Suarez

Debtor(s).

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Case No.: 17-50809

Chapter 13

Judge John E. Hoffman Jr.

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**NOTICE OF FORBEARANCE AGREEMENT PURSUANT TO A COVID-19
HARDSHIP**

COMES NOW, Manley Deas Kochalski LLC, on behalf of Secured Creditor, PNC Bank, National Association and files this Notice of Forbearance Agreement Pursuant to a COVID-19 Hardship (the "Notice") with the Court regarding Debtor's request for payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic, and in support of same, states as follows:

1. Debtor(s) requested a forbearance agreement related to a COVID-19 hardship with respect to Debtor's property located at 7840 Overland Trl, Delaware, OH 43015.

2. Secured Creditor agreed to a payment forbearance for a period of 3 months starting with the month of June 1, 2020 and ending with the month of August 1, 2020 (the "Forbearance Period").

3. By this Notice, Secured Creditor is requesting that Debtor's (Debtors') counsel take whatever steps are necessary, if any, to formalize this agreement with the Bankruptcy Court, such as an Amended Plan, Request for Loss Mitigation or Notice of Loan Modification if same is required.

4. Secured Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment during the Forbearance Period, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

5. Secured Creditor does not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends, subject to the rules of the Bankruptcy Code.

6. Secured Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage, subject to the rules of the Bankruptcy Code.

7. Furthermore, during the forbearance period Secured Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall (0088234)

Edward H. Cahill (0088985)

John R. Cummins (0036811)

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Attorneys for Creditor

The case attorney for this file is Adam B. Hall.

Contact email is abh@manleydeas.com

Counsel for Secured Creditor, PNC Bank,
National Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Forbearance Agreement Pursuant to a COVID-19 Hardship was served **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Faye D. English, Chapter 13 Trustee, 10 West Broad Street, Suite 1600, Columbus, OH 43215-3419, faye.english@ch13columbus.com

Brian D. Wood, Attorney for Joseph W Suarez, 470 Olde Worthington Road, Suite 200, Westerville, OH 43082, bwood@woodbrewerlaw.com

and by ordinary U.S. mail on May 1, 2020 addressed to:

Joseph W Suarez, 7840 Overland Trail, Delaware, OH 43015

Joseph W Suarez, 7840 Overland Trl, Delaware, OH 43015

Delaware County Treasurer, 145 N Union St, Delaware, OH 43015

/s/ Adam B. Hall
